

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

EUGENE CAMPBELL,

Plaintiff,

vs.

AHERN RENTALS, INC.,

Defendant.

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CIVIL ACTION NO. 3:20-CV-00477-E

DEFENDANT’S MOTION TO WITHDRAW MICHAEL P. ROYAL AS COUNSEL

Pursuant to Local Rule 83.12, Defendant Ahern Rentals, Inc., through its attorneys of record, files this Unopposed Motion to Withdraw Michael P. Royal as Counsel (the “Motion”), and in support thereof shows the Court the following:

1. Defendant has been represented in this action by Michael P. Royal, Patrick H. Hicks and Mark A. Flores of the law firm of Littler Mendelson, P.C.

2. Mr. Royal seeks to withdraw as Mr. Hicks has been admitted *pro hac vice*.

2. Defendant requests that Mr. Royal be withdrawn as Defendant’s counsel of record in this cause. Patrick H. Hicks (who has been admitted *pro hac vice*), a shareholder, will succeed Mr. Royal as lead counsel. Mr. Hicks’ contact information is as follows:

Patrick H. Hicks
Nevada State Bar No. 24082629
Admitted *pro hac vice*
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
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Las Vegas, NV 89169-5937
(702) 862-8800
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phicks@littler.com

3. Mr. Hicks will act as attorney-in-charge on behalf of Defendant in this matter.

4. No delay or injustice will be caused by Mr. Royal's withdrawal as counsel for Defendant. Defendant seeks no extensions of existing deadlines on account of this withdrawal. Counsel for Plaintiff has indicated no opposition to the relief requested in this Motion.

WHEREFORE, Defendant respectfully requests the Court to (i) grant this Motion, and (ii) enter an Order withdrawing Michael P. Royal as counsel of record for Defendant in this matter and substituting Mr. Hicks as co-counsel for the Defendant.

Dated: February 9, 2021

Respectfully submitted,

/s/ Michael P. Royal

Michael P. Royal
Texas State Bar No. 00784886
Mark A. Flores
Texas State Bar No. 24076385
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ATTORNEYS FOR DEFENDANT
AHERN RENTALS, INC.

CERTIFICATE OF CONFERENCE

I hereby certify that on February 9, 2021, I personally conferred with counsel of record for Plaintiff regarding the substance of this Motion, and Plaintiff indicated no opposition to the Motion.

/s/ Mark A. Flores

Mark A. Flores

CERTIFICATE OF SERVICE

On February 9, 2021, I electronically submitted the foregoing document with the clerk of court for the United States District Court, Northern District of Texas, using the Case Management/Electronic Case Filing (CM/ECF) system of the Court. The CM/ECF system sent a Notice of Electronic Filing to the following counsel of record who consented in writing to accept service of this document by electronic means:

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/s/ Michael P. Royal

Michael P. Royal

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